Deseret Chemical Depot Attachment 13 – Waste Piles December 2004

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Waste Piles [R315-3-2.9, R315-8-12]

1.0 <u>List of Wastes</u> [R315-3-2.9(a)]

1.1 Wastes stored in Building 4107 waste piles include wastes assigned the Utah Department of Environmental Quality, Division of Solid and Hazardous Waste (DSHW) waste code F999. No wastes having the waste code P999 can be stored in the waste pile in building 4107, (residue from the treatment or testing of chemical warfare agents). In addition, other waste codes may be applied to items stored in the waste piles. All items slated to be managed in waste piles in Building 4107 that may have been contaminated with chemical agent(s) will undergo air monitoring prior to relocation to Building 4107. Air monitoring may not be used for porous materials. Inorganic solid wastes may be stored in Building 4107 waste piles as necessary to support Deseret Chemical Depot (DCD) operations.

2.0 <u>Exemption from Waste Pile Design and Operating Requirements</u> [R315-3-2.9(b), R315-8-12.1(c)]

- 2.1 The owner or operator of any waste pile situated inside or under a structure that provides protection from precipitation so that neither run-off nor leachate is generated is not subject to regulation under R315-8-12.2, provided that:
 - 2.1.1 Liquids or materials containing free liquids are not placed in the pile;
 - 2.1.2 The pile is protected from surface water run-on or groundwater run-on by the structure or in some other manner;
 - 2.1.3 The pile is designed and operated to control dispersal of the waste by wind, where necessary, by means other than wetting; and
 - 2.1.4 The pile will not generate leachate through decomposition or other reactions.
- As indicated in Section 1.1, DCD will only use the Building 4107 waste piles for the storage of inorganic solid waste with no free liquids. The igloo doors currently stored in the waste piles, and all other wastes that may be added to the waste piles, contain no free liquids and are incapable of generating any free liquid or leachate. The structure of Building 4107 completely encloses the waste piles, providing protection from precipitation so that neither run-off nor leachate is generated. Wind dispersal is prevented by the nature of the waste (steel doors filled with concrete) and because the waste pile will be enclosed within a building. Building 4107 has a shell and a concrete base that is elevated approximately 2 feet above exterior grade to prevent run-on. As such, Building 4107 waste pile storage meets the requirements of R315-8-12.1(c). Therefore, the storage unit is exempt from the design and operating requirements of R315-8-12.2.